

## UNITED STATES DISTRICT COURT

for the

Eastern District of Virginia

In re Ex Parte Application of N.P.S.S.F. Debt  
Co., S.à.r.l., pursuant to 28 U.S.C. § 1782 to  
Conduct Discovery for Use in Foreign  
Proceedings,

Civil Action No. 1:23-mc-00017

**SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS  
OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION**

To: International Registries, Inc.

(Name of person to whom this subpoena is directed)

☒ **Production:** **YOU ARE COMMANDED** to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material:

See Attachment A.

Place: Baker & Hostetler LLP c/o Renee M. Knudsen 1050 Connecticut Avenue NW, Suite 1100 Washington, D.C. 20036	Date and Time: To be determined
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☐ **Inspection of Premises:** **YOU ARE COMMANDED** to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place:	Date and Time:
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The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 09/06/2023

CLERK OF COURT



*Dana Van Metre*  
Digitally signed by Dana Van Metre  
Date: 2023.09.06 11:53:55 -04'00'

OR

Signature of Clerk or Deputy Clerk

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing (name of party)

Petitioner N.P.S.S.F. Debt Co., S.à.r.l., who issues or requests this subpoena, are:

Renee M. Knudsen, Baker &amp; Hostetler LLP (DC), Email: rknudsen@bakerlaw.com, Phone: (202) 861-1599

**Notice to the person who issues or requests this subpoena**

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

Civil Action No. \_\_\_\_\_

**PROOF OF SERVICE**

*(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)*

I received this subpoena for *(name of individual and title, if any)* \_\_\_\_\_

on *(date)* \_\_\_\_\_ .

☐ I served the subpoena by delivering a copy to the named person as follows: \_\_\_\_\_

\_\_\_\_\_ on *(date)* \_\_\_\_\_ ; or

☐ I returned the subpoena unexecuted because: \_\_\_\_\_

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of \$ \_\_\_\_\_ .

My fees are \$ \_\_\_\_\_ for travel and \$ \_\_\_\_\_ for services, for a total of \$ \_\_\_\_\_ 0.00 .

I declare under penalty of perjury that this information is true.

Date: \_\_\_\_\_

\_\_\_\_\_  
*Server's signature*

\_\_\_\_\_  
*Printed name and title*

\_\_\_\_\_  
*Server's address*

Additional information regarding attempted service, etc.:

**Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)****(c) Place of Compliance.**

**(1) For a Trial, Hearing, or Deposition.** A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person
  - (i) is a party or a party's officer; or
  - (ii) is commanded to attend a trial and would not incur substantial expense.

**(2) For Other Discovery.** A subpoena may command:

- (A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
- (B) inspection of premises at the premises to be inspected.

**(d) Protecting a Person Subject to a Subpoena; Enforcement.**

**(1) Avoiding Undue Burden or Expense; Sanctions.** A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

**(2) Command to Produce Materials or Permit Inspection.**

(A) *Appearance Not Required.* A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) *Objections.* A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

**(3) Quashing or Modifying a Subpoena.**

(A) *When Required.* On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

- (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
- (iv) subjects a person to undue burden.

(B) *When Permitted.* To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

(C) *Specifying Conditions as an Alternative.* In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
- (ii) ensures that the subpoenaed person will be reasonably compensated.

**(e) Duties in Responding to a Subpoena.**

**(1) Producing Documents or Electronically Stored Information.** These procedures apply to producing documents or electronically stored information:

(A) *Documents.* A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

(B) *Form for Producing Electronically Stored Information Not Specified.* If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) *Electronically Stored Information Produced in Only One Form.* The person responding need not produce the same electronically stored information in more than one form.

(D) *Inaccessible Electronically Stored Information.* The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

**(2) Claiming Privilege or Protection.**

(A) *Information Withheld.* A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

- (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) *Information Produced.* If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

**(g) Contempt.**

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

## **ATTACHMENT A**

### **DEFINITIONS**

1. The word “document(s)” includes, but is not limited to written, printed, or recorded material from whatever source derived and however and by whomever prepared, produced, reproduced, disseminated or made. Without limiting the generality of the foregoing, “document(s)” includes the original and any non-identical copy and also every draft and proposed draft of all correspondence, internal memoranda, notes of meetings, facsimiles, electronic mail, reports, transcripts or notes of telephone conversations, notebooks, notes, reports, analyses, computer printouts, and any other writings or documentary materials of any nature whatsoever, whether or not divulged to other parties, together with any attachments thereto and enclosures therewith. In addition, the “document(s)” encompasses electronically stored information (“ESI”) including but not limited to “email.”

2. The word “person(s)” includes not only natural persons, but also firms, partnerships, associations, corporations, subsidiaries, divisions, departments, joint ventures, proprietorships, syndicates, trusts, groups, and organizations; federal, state, or local governments or government agencies, offices, bureaus, departments, or entities; other legal, business or government entities; and all subsidiaries, affiliates, divisions, departments, branches, and other units thereof or any combination thereof.

3. As used herein, any reference to any “person” includes the present and former officers, executives, partners, directors, employees, attorneys, agents, representatives, and all other persons acting or purporting to act on behalf of the person and also its subsidiaries, affiliates, divisions, and predecessors and successors in interest.

4. The term “Affiliated Person” includes all employees, consultants, agents, representatives, entities, subsidiaries, or parents.

5. The term “IRI” refers to International Registries, Inc., any parent or subsidiary entity, any other entity owned (in whole or part) by or controlled by IRI and/or its Affiliated Persons, and any predecessor or successor thereof.

6. The term “TCMI” refers to The Trust Company of the Marshall Islands, Inc. and any agent acting on its behalf.

### **INSTRUCTIONS**

1. Any document produced in response to this subpoena should be produced in full, complete, and unedited form, together with all drafts and non-identical copies of each, and in reasonably accessible electronic form, if practicable.

2. Whenever the information requested is not readily available in the form requested but is available or can more easily be made available in a different form, you may make the information available in such different form, provided that the information requested is readily intelligible in such different form made available by you.

3. Whenever a Request calls for “documents sufficient to” provide certain information, you may at your option respond, in lieu of producing documents, by a written statement of that information verified by you or your representative.

4. Each Request should be construed so as to make the Request inclusive rather than exclusive.

5. If you object to a Request, state the legal and factual basis for the objection, describe the information or documents that you propose to withhold pursuant to that objection, and fully answer all portions of the Request not objected to.

6. If you refuse to respond to any Request, or any subpart thereof, on the ground of privilege or attorney work product doctrine, provide the specific reasons for doing so in writing at the time of your response to these Requests.

## **DOCUMENT REQUESTS**

You are hereby requested to produce the following documents as applicable to Addenda A and B, attached hereto, and the terms listed therein:

- (1) Any file (electronic or otherwise) maintained for each Addendum A entity.
- (2) To the extent not otherwise produced, all Documents provided by each Addendum A entity in connection with its application for registration or by each Addendum B contact, including but not limited to application forms, incorporation documents, corporate registers, and mortgage documents.
- (3) To the extent not otherwise produced, all Documents provided by each Addendum A entity in connection with its current and ongoing registration, including any additional corporate documents requested of the registrant.
- (4) To the extent not otherwise produced, Documents sufficient to identify the registered shareholders and/or directors for each Addendum A entity, and any contact information provided.
- (5) To the extent not otherwise produced, Documents sufficient to identify the purported purpose of each Addendum A entity.
- (6) To the extent not otherwise produced, Documents sufficient to identify the registered agent for each Addendum A entity and the contact information for that registered agent.
- (7) To the extent not otherwise produced, Communications between IRI or TCMI and any agent or representative of the Addendum A entity, including but not limited to the registered agent, shareholder, director, beneficial owners, or anyone purporting to act on the entity's behalf, or between IRI/TCMI and an Addendum B contact.

- (8) To the extent not otherwise produced, any notes or internal memoranda reflecting Communications between IRI or TCMI and any agent or representative of the Addendum A entity, including but not limited to the registered agent, shareholder, director, beneficial owners, or anyone purporting to act on the entity's behalf, or between IRI or TCMI and an Addendum B contact.
- (9) To the extent not otherwise produced, Documents sufficient to show payments made by the Addendum A entity to IRI or TCMI, including paid invoices and records, such as checks, wires, and credit cards, reflecting bank or credit accounts held by the Addendum A entity or by an Addendum B contact.



**ADDENDUM A**

<b>Number</b>	<b>Entity</b>
15069	Worldwide Green Tankers
16874	Albatross Maritime SA
21358	Sanibel Shiptrade Ltd
48750	MW Afritec SA
72355	Adamant Maritime Ltd
90578	Gemini Development Management
93683	Afreda Shipmanagement Co
93818	Delos Voyager Shipping Ltd
96214	Cardin Shiptrade Ltd
96655	Vega Maritime No 3 Ltd
97990	Rondine Int Ltd
99819	Waverise Finance SA
100926	Seaborne Shipbrokers SA
104259	Galini Shipmanagement Inc
104450	Searoute Management Ltd
104494	Albatross Maritime Shipping SA
104832	Dimon Maritime Co Ltd
105734	Imperium Maritime Inc
106098	Larsa Shipping Ltd
106099	Eudora Ltd
106100	Grand Eagle Maritime Inc
106101	Ocean Pearl Navigation Inc
106102	Black Pearl Navigation Inc
106103	Financial & Legal Consulting Inc.
106340	Ikasto Ventures Inc
106558	Global Forever Limited
106575	Ornella Shipping Inc
106739	Hawks Navigation SA
106883	Marovo International Corp
107145	Global Tech Marine Services Inc.
107346	Technology Bright Co Ltd
107471	Sino PPE Industry Co Ltdce
107472	Valor Capital Corp
107473	Socian International Limited

107474	Promarine Shipping Holdings SA
107475	Promarine Shipmanagement Co SA
107476	BR Glory Shipping LTd
107477	Genesis Maritime Ltd
107478	Minerals Chartering Inc
107479	Tredinian Shipping SA
107480	Vadim Maritime Co
107481	Tryfo Navigation Inc
107482	Departier Shiptrade Co
107483	Kassel Shipholding Inc
107484	Odiar Management SA
107485	Aznavour Marine Company
107486	Bardeau Ventures Ltd
107487	Bonneure Shipping Corp
107488	Cotiar Navigation Co
107489	Eshadow Ltd
107490	Binoche Shiptrade SA
107491	Totou Shipmanagement Inc
107492	Ion Trading SA
107493	Mountain View Inc
107494	Mur Shipping Inc
107495	ABG Overseas Ltd
107496	Crazy 88 Inc
107635	Faver Ltd
107636	Corefi Inc
107637	Arikon Industrial Co Limited
107638	Sevenlakes Yachting Ltd
107639	ECOBulk Shipping Inc
107640	Orounda Shipping Corporation
107641	Oroklini Shipping Corporation
107642	Esmerelda Navigation Ltd
107643	GN Maritime SA
107644	Evgenia Navigation Ltd
107645	Exona Inc
107646	Davidson Ltd
107647	Omani Ventures Inc
107648	Vigor Shiptrade SA
107649	Filla Navigation Corp
107650	Seasreno Marine Ltd
107651	Sokrid Maritime Co
107652	Dounima Shipping Ltd

107653	Ateca Shipholding SA
107654	Nativa Management Limited
107655	Velostar Shipping Company
107656	Aquator Marine Corp
107657	Armada Shiptrade Co.
107658	Splash Shipmanagement Inc
107659	Aspire Maritime Ltd
107660	Supra Chartering Company
107661	Alphard Ventures SA
107662	Suez Hans Shipping Ltd
107663	Suez Rajan Shipping Ltd
107664	Suez Hans Holding Ltd
107665	Suez Rajan Holding Ltd
107666	Suez Holdings Limited
107667	NLS Shipping and Trading SA
107790	Azul Vista Shipping Corporation
107804	Monumont Ship Management Ltd
107810	Expanse Ship Management Ltd
107944	Holger Navigation Corp
108160	Blue Berri Shipping Incorporated
108904	Vista Clara Shipping Corporation
109466	Harbour Ship Management Ltd
111035	Tyron Shipping Limited
111940	Flynn Ventures Ltd
113129	Intrepid Navigators SA
113453	Triton Navigation Corp
113562	Pontus Navigation Corp
113667	Rising Tide Shipping Corp
114637	Capellen Enterprise Ltd
117472	Freyana Shipping Ltd
117473	Septala Navigation Ltd
117474	Shivshai Marine Ltd
117475	Shukria Shipping Ltd
117656	Opal River Shipping Limited
117657	Titan Shipping & Marine Inc
117658	Afrona Marine Ltd
117659	Anandya Shipping Ltd
117660	Chatori Navigation Limited
117661	Chatula Marine Ltd
117662	Corale International Ltd
117663	Durbeen Navigation Ltd

117664	Harlon Oceanic Ltd
117665	Kurchan Maritime Ltd
117666	Mando Shipping Ltd
118552	Pearl Shipping & Marine Inc
118553	Sabun Marine Ltd
118554	Haycroft Shipping Ltd
118555	Zorona Shipping Ltd
118557	Purana Navigation Ltd
118558	Regueton Shipping Co
118909	Pablo Union Shipping Inc.
120096	Elory Logistics Ltd
964509	Mountain Finance LLC
120450	Eternal Light Shipping Ltd
120451	Oceanica Shipping Ltd
120452	Mazona Offshore Ltd
92525	Bulkers Co.
118856	Fire Maritime and Trading Inc.
120452	Mazona Offshore Limited
120453	Gimbal Marine Limited
120454	Clariton Shipping Limited
120456	Andor Marine Limited

**ADDENDUM B**

	<b>Name</b>	<b>Email</b>
1	Muhammad Tahir Lakhani	Tahir@dtashipping.com tahir@unitedeastern.co.uk lakhani.london1@gmail.com tl@dtashipping.com
2	Muhammad Ali Lakhani	Ali@northstar-holdings.com ali@dtashipping.com mrmidwakh@aol.com alilakhaniuett@gmail.com ali@unitedeastern.co.uk
3	Muhammad Hasan Lakhani	hasanlak@gmail.com
4	Uneza Tahir Lakhani	Uneza@waverisesa.com
5	John Michael Ormerod	john@ormerodallen.net
6	Subba Rao Varanasi	finance@waverise.com rao.varanasi@gulfstarsa.com rao.varanasi@dubainavigation.com
7	Sujan Iyot Singh Malhotra	sujaan@dubainavigation.com
8	Nicholas Charles Dean	nick@mcms.mc
9	Eric Ravera	eric@mcms.mc
10	Syed Muhammad Azhar	